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May 15, 2024

**VIA ECF**

Honorable Rachel P. Kovner  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") Ariel Semper, Nadine Cenord, Bernadet Jean-Louis, Donna McFadden, Ana Costa, Taiesha Coleman, and Leydi Taveras in this matter. Defendants respectfully request a five-day extension of their time to move to dismiss the Amended Complaint (ECF No. 37) along with matching extensions to the remainder of the briefing schedule. This is Defendants' first request to extend their time to move to dismiss the Amended Complaint and Plaintiffs' consent to this request.

I have been extensively involved in the launch of a series of new agency processes this week connected to the implementation of a large settlement in another litigation. The timing of this week's launch and the extent of my associated time commitments remained unclear at the time the parties proposed the current briefing schedule. I would appreciate the requested five-day extension to finish preparing Defendants' motion papers. Defendants' requested revisions to the briefing schedule are set forth below:

- **Defendants' Motion to Dismiss:** May 22, 2024;
- **Plaintiffs' Opposition:** June 5, 2024; and
- **Defendants' Reply:** June 10, 2024.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

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Daniel R. Perez  
Assistant Corporation Counsel